

William J. O'Shaughnessy (WJO 5256)  
**McCARTER & ENGLISH, LLP**  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 622-4444

Evan R. Chesler  
Peter T. Barbur  
Elizabeth L. Grayer  
Karin A. DeMasi  
**CRAVATH, SWAINE & MOORE LLP**  
825 Eighth Avenue  
New York, NY 10019  
(212) 474-1000

Richard S. Taffet  
Philip L. Blum  
**BINGHAM McCUTCHEN LLP**  
399 Park Avenue  
New York, NY 10022  
(212) 705-7000

Robert N. Feltoon  
**CONRAD O'BRIEN GELLMAN & ROHN, P.C.**  
1515 Market Street, Suite 1600  
Philadelphia, PA 19102  
(215) 864-8064

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,

Plaintiff.

v.

QUALCOMM INCORPORATED,

Defendant.

Civil Action No. 05-3350 (MLC)

**QUALCOMM INCORPORATED'S AMENDED AND SUPPLEMENTAL  
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)**

**EXHIBIT** 3 PAGE 167

Defendant QUALCOMM Incorporated ("Qualcomm") hereby submits the following amended initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. The following amended and supplemental initial disclosures are intended to supersede Qualcomm Incorporated's Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, dated October 28, 2005.

Qualcomm has not fully completed its investigation into its claims and/or defenses herein and makes these disclosures based solely on information reasonably available to it to date and reserves the right to amend or further supplement these disclosures. Qualcomm makes these disclosures subject to, and without waiver of, any attorney-client, work product or other applicable privileges or immunities.

**A.i. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

The following individuals may have discoverable information, relating to the bracketed subjects, that Qualcomm may use to support its defenses herein.

Qualcomm provides each individual's current position:<sup>1</sup>

1. Derek Aberle  
*Vice President & General Manager, CDMA Licensing*  
 QUALCOMM Incorporated  
 5775 Morehouse Drive  
 San Diego, CA 92121  
 Phone: (858) 587-1121  
 [Qualcomm's licensing discussions with Broadcom; Qualcomm licensing practices and policies; Licensing practices of wireless communications and video technology industry participants]

---

<sup>1</sup> All persons whose names are underlined are current or former employees of Qualcomm. All communications with those individuals should be made only through Qualcomm counsel.

2. Avneesh Agrawal  
*Senior Vice President, Engineering*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's acquisition of Flarion and research and development activities; Qualcomm's development of OFDMA technology]
3. Jeff Altman  
*Sr. Director, Business Development*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's licensing discussions with Broadcom]
4. Steve Altman  
*President*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's competitive position, business strategy, and licensing practices and policies; European Telecommunications Standards Institute ("ETSI") selection of WCDMA for the UMTS standard; Qualcomm's licensing discussions with Broadcom; Licensing practices of wireless communications and video technology industry participants]
5. Cristiano Amon  
*Sr. Vice President, Product Management*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of Qualcomm's WCDMA chipset products; Relative merits of wireless solutions provided by Broadcom, Qualcomm and other third party wireless communications industry participants]
6. Niels Peter Skov Andersen  
*Vice President, Technical Standards*  
QUALCOMM Denmark  
Lxvparken 14  
DK Roskilde  
Phone: 45-4018-4793  
[ETSI, including, Qualcomm's participation in and commitments to ETSI; ETSI's selection of WCDMA for the UMTS standard]

7. Kent Baker  
*Vice President, Patent Counsel*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[ETSI's selection of WCDMA for the UMTS standard; Qualcomm's IPR disclosures; Content of relevant IPR policies of standards development organizations; Industry practice with regard to IPR disclosure and the making of FRAND commitments to standards development organizations]
8. Yiliang Bao  
*Engineer, Sr. Staff Manager*  
QUALCOMM Incorporated  
10145 Pacific Heights Blvd.  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to the Joint Video Team ("JVT")]
9. Jeff Belk  
*Senior Vice President, Marketing*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of and competition in wireless communications technology, including industry trends]
10. Paul Bender  
*Sr. Vice President, Technology*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Wireless communications technologies; Qualcomm's research and development activities]

11. Liat Ben-Zur  
*Director, Business Development*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's WCDMA chipset business, including competitive position and business strategy; Business reputation of Broadcom; Relative merits of wireless solutions offered by Qualcomm, Broadcom and third party wireless communications industry participants]
12. Peter Black  
*Sr. Vice President, Technology*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Wireless communications technologies; Qualcomm's research and development activities]
13. Marv Blecker  
*President, Qualcomm Technology Licensing*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm licensing practices and policies; Qualcomm's licensing discussions with Broadcom; Licensing practices of wireless communications and video technology industry participants]
14. Kirk Burroughs  
*Engineer, Principal*  
QUALCOMM Incorporated  
675 Campbell Technology Parkway  
Campbell, CA 95008  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to ETSI]

15. David Bush  
*Sr. Vice President, Sales*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's WCDMA chipset business, including competitive position and business strategy; Qualcomm's sales and pricing of WCDMA chipset products; Qualcomm's efforts to meet customers' demand for WCDMA chipsets]
16. Lorenzo Casaccia  
*Sr. Staff Engineer*  
QUALCOMM Italy  
Via Tirso #6, 3rd Floor  
Rome, Italy 00198  
Phone: 39-06-49-218121  
[Qualcomm's participation in and commitments to ETSI]
17. James Clifford  
*Senior Vice President & General Manager, Operations*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's efforts to meet customers' demand for chipsets]
18. Gregory Cobb  
*Vice President and Assistant General Manager, Technology Licensing*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm licensing practices and policies; Qualcomm's licensing discussions with Broadcom]
19. William ("Bill") Davidson  
*Sr. Vice President, Global Marketing and Investor Relations*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of and competition in wireless communications technology, including industry trends]

20. Sean English  
*Vice President, Legal Counsel*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's IPR disclosures]
21. Mark Epstein  
*Senior Vice President, Development*  
QUALCOMM Incorporated  
9209 Fox Meadow Lane  
Potomac, MD 20854  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to IEEE]
22. Mark Frankel  
*Vice President, Product Management*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of Qualcomm's WCDMA chipset products; Relative merits of wireless solutions provided by Broadcom, Qualcomm and other third party wireless communications industry participants]
23. Harinath Garudardri  
*Engineer, Sr. Staff Manager*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's analysis of its IPR with respect to JVT standards]
24. Andrew Gilbert  
*Sr. Vice President, President, Qualcomm Europe*  
QUALCOMM Incorporated  
Waterfront 4th floor  
Hammersmith Embankment  
Chancellors Road  
London, W6 9RU  
Phone: 44-7909-910317  
[Qualcomm's competitive position, business strategy, and licensing practices]

25. Klein Gilhousen  
*Sr. Vice President, Technology*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Wireless communications technologies]
26. Olivier Glauser  
*Sr. Director, Business Development*  
Former Employee  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[ETSI's selection of WCDMA for the UMTS standard]
27. Jin Guo  
*Director, Technical Marketing*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of and competition in wireless communications technology, including industry trends]
28. Michael Hartogs  
*Sr. Vice President, Div. Counsel (Qualcomm Technology Licensing)*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm licensing practices and policies; Qualcomm's licensing discussions with Broadcom; Licensing practices of wireless communications and video technology industry participants; Content of relevant IPR policies of standards development organizations]
29. Chris Irvine  
*Principal Engineer (QTC/QDM/QGOV)*  
QUALCOMM Incorporated  
Non-Qualcomm Site  
Phone: (858) 651-3425  
[Qualcomm's analysis of its IPR with respect to JVT standards]



30. Jordan Isailovic  
*Consultant*  
QUALCOMM Incorporated  
P.O. Box 17516  
Anaheim, CA 92807  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT]
31. Irwin Jacobs  
*Chairman*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[History of Qualcomm, CDMA and wireless communications]
32. Paul Jacobs  
*Chief Executive Officer*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's competitive position and business strategy]
33. Sanjay Jha  
*Executive Vice President and Group President, Qualcomm CDMA Technologies*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's WCDMA chipset business, including competitive position, business strategy, and WCDMA chipset features; Marketing of Qualcomm's WCDMA chipset products; Qualcomm's research and development activities; Relative merits of wireless solutions provided by Broadcom, Qualcomm and other third party wireless communications industry participants; Business reputation of Broadcom]
34. Tingfang Ji  
*Engineer, Staff Manager*  
QUALCOMM Incorporated  
6965 Lusk Blvd  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's development of OFDMA technology]

35. Alex Katouzian  
*Vice President, Product Management*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of Qualcomm's WCDMA chipset products; Relative merits of wireless solutions provided by Broadcom, Qualcomm and other third party wireless communications industry participants; Business reputation of Broadcom]
36. Farrokh Khatibi  
*Director, Engineering (QSE)*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to IEEE]
37. Mark Klerer  
*Sr. Director, Technology*  
QUALCOMM Incorporated  
500 Somerset Corporate Blvd.  
Bridgewater, NJ 08807  
Phone: (908) 443-8092  
[Qualcomm's participation in and commitments to IEEE]
38. Warren Kneeshaw  
*Vice President, Finance*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's analysis of the costs to carriers of switching between wireless communications standards]
39. Anil Kripalani  
*Sr. Vice President, Global Tech. Affairs*  
Former Employee  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[ETSI's selection of WCDMA for the UMTS standard]

40. James Lederer  
*Senior Vice President, Finance*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Pricing and costs of Qualcomm's WCDMA chipset products]
41. Louis Lupin  
*Legal Consultant, former Executive Vice President, General Counsel*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's licensing discussions with Broadcom; Qualcomm licensing practices and policies; ETSI's selection of WCDMA for the UMTS standard; Qualcomm's IPR disclosures; Content of relevant IPR policies of standards development organizations]
42. Clint McClellan  
*Sr. Director, Marketing*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of and competition in wireless communications technology, including industry trends]
43. Sanjay Mehta  
*Vice President, Finance*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Pricing, costs and sales of Qualcomm's WCDMA chipset products; Qualcomm's efforts to meet customers' demand for WCDMA chipsets]
44. Max Miyazono  
*Sr. Manager, Technical Marketing (CTR)*  
Former Employee  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of and competition in wireless communications technology, including industry trends]

45. Ayman Naguib  
*Sr. Staff Engineer (CORP R&D SYS Engineering)*  
QUALCOMM Incorporated  
6965 Lusk Blvd.  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to IEEE]
46. Sanjiv Nanda  
*Sr. Director, Engineering (Corporate System Engineering)*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT]
47. Andy Oberst  
*Vice President, Business Strategy*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's WCDMA chipset business, including competitive position and business strategy; Business reputation of Broadcom; Relative merits of wireless solutions provided by Broadcom, Qualcomm and other third party wireless communications industry participants]
48. Roberto Padovani  
*Executive Vice President and Chief Technology Officer*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Wireless communications technologies; Qualcomm's research and development activities; History of Qualcomm, CDMA and wireless communications]

49. Luis Pineda  
*Senior Vice President, Marketing and Product Management*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's WCDMA chipset business, including competitive position and business strategy; Marketing of Qualcomm's WCDMA chipset products; Relative merits of wireless solutions provided by Broadcom, Qualcomm and other third party wireless communications industry participants]
50. Gene Ratliffe  
*Sr. Manager, Finance*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Pricing, costs and sales of Qualcomm's WCDMA chipset products; Qualcomm's efforts to meet customers' demand for WCDMA chipsets]
51. Viji Raveendran  
*Sr. Staff Engineer (QDM & QCT)*  
QUALCOMM Incorporated  
10145 Pacific Heights Blvd  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT; Qualcomm's analysis of its IPR with respect to JVT standards]
52. Yuriy Reznik  
*Staff Engineer*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT]

53. Hank Robinson  
*Vice President, Sales*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's sales and pricing of WCDMA chipset products and  
Qualcomm's efforts to meet customers' demand for WCDMA chipsets]
54. Thomas Rouse  
*Vice President, Chief Patent Counsel*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's IPR disclosures]
55. Phoom Sagetong  
*Staff Engineer (Corp. R&D)*  
Former Employee  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT]
56. Donald Schrock  
*Executive Vice President, QCT*  
Former Employee  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's WCDMA chipset business, including competitive position  
and business strategy]
57. Amnon Silberger  
*Sr. Staff Engineer (QDM/MFT)*  
QUALCOMM Incorporated  
9940 Barnes Canyon Rd  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT; Qualcomm's  
analysis of its IPR with respect to JVT standards]

58. Kevin Thompson  
*Vice President, Sales Operations*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's efforts to meet customers' demand for WCDMA chipsets]
59. Edward Tiedemann  
*Senior Vice President, Engineering*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to ETSI and IEEE;  
ETSI's selection of WCDMA for the UMTS standard; Content of relevant  
IPR policies of standards development organizations]
60. James Tomcik  
*Director Engineering*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to the IEEE]
61. Stephane Tronchon  
*Legal Counsel*  
QUALCOMM France  
40 Rue d'Oradour sur Glane  
1st and 4th floors  
Paris, 75015  
Phone: 33-4-92-96-91-16  
[ETSI's selection of WCDMA for the UMTS standard; Qualcomm's  
processes and practices for determining whether and when to disclose  
patents to standards development organizations; Content of relevant IPR  
policies of standards development organizations; Industry practice with  
regard to IPR disclosure and the making of FRAND commitments to  
standards development organizations]
62. Jerry Upton  
*Consultant*  
317 North Meacham  
Park Ridge, IL 60068  
Phone: (847) 772-4800  
[Qualcomm's participation in and commitments to the IEEE]

63. Herbert Vanhove  
*Vice President, Product Management*  
QUALCOMM Incorporated  
Waterfront 4th floor  
Hammersmith Embankment  
Chancellor's Road  
London, W6 9RU  
Phone: 44-20-8237-7123  
[Qualcomm's participation in and commitments to ETSI]
64. Tom Wasilewski  
*Sr. Director Government Affairs*  
QUALCOMM Incorporated  
2001 Pennsylvania Ave, NW  
Suite 650  
Washington, DC 20006-1850  
Phone: (202) 263-0028  
[Qualcomm's participation in and commitments to the IEEE]
65. Serge Willenegger  
*Sr. Director, Technology*  
QUALCOMM Switzerland  
Vignes-Dessous  
1425 ONNENS  
Switzerland  
Phone: 41-244-363541  
[Qualcomm's participation in and commitments to ETSI; ETSI's selection of WCDMA for the UMTS standard]
66. David Wise  
*Vice President, Finance*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's acquisition of Flarion]
67. Charles ("Chuck") Wheatley  
*Sr. Vice President, Technology*  
QUALCOMM Incorporated  
5665 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[History of Qualcomm, CDMA and wireless communications; Wireless communications technologies]



68. Rao Yallapragada  
*Sr. Director Technical Marketing*  
QUALCOMM Incorporated  
6965 Lusk Blvd  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Marketing of and competition in wireless communications technology, including industry trends]
69. Jay Yun  
*Staff Engineer (QDM & QCT)*  
QUALCOMM Incorporated  
10145 Pacific Heights Blvd  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to JVT; Qualcomm's analysis of its IPR with respect to JVT standards]
70. Byeong-Ho Yuu  
*Sr. Patent Counsel*  
QUALCOMM Incorporated  
5775 Morehouse Drive  
San Diego, CA 92121  
Phone: (858) 587-1121  
[Qualcomm's participation in and commitments to ETSI]
71. Broadcom Corporation, its subsidiaries and its employees  
16215 Alton Parkway  
Irvine, California USA 92618  
[Broadcom's practices and policies respecting, and commitments to, standards development organizations; Broadcom's wireless communications business and strategy; Licensing discussions between Broadcom and Qualcomm; Discussions between Broadcom and other wireless communications industry participants concerning Qualcomm or the adoption by ETSI of the WCDMA standard; Broadcom's attempts to design, develop, manufacture, market and sell chipset solutions implementing or compliant with the WCDMA standard; Broadcom's policies and practices with respect to licensing; Broadcom's ability or inability fairly to compete in the market for wireless communications chipset solutions; Broadcom's policies and practices with respect to the sales of ASICs (for any application), including bundling and rebate practices; and Broadcom's motivation in bringing this action]

**A.ii. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

The following categories of documents, copies of which are located in the files of the persons listed in Section A above or in general Qualcomm files, may be used by Qualcomm to support its defenses in this action:

- Documents regarding the licensing practices of wireless communications technology industry participants
- Documents regarding the IPR disclosure practices of participants in standards development organizations
- Documents regarding practices and conduct of participants in standards development organizations
- Documents regarding competition in digital video technology
- Documents regarding the licensing practices of participants in the digital video technology industry
- Documents regarding proposals to standards development organizations, and the consideration thereof by standards development organizations and their respective members or participants
- Documents regarding the relative merits of different technologies or specifications that were considered by standards development organizations
- Documents regarding the relative merits of various vendors' wireless application-specific integrated circuits

These documents are likely to be located at Qualcomm's San Diego campus and at its offices at 9 Damon Mill Square - Suite 2A, Concord, MA 01742-2864.

As Qualcomm has previously advised plaintiff, some of the documents requested by plaintiff exist in an electronic form. Some of the documents that Qualcomm may use to support its claims or defenses exist in an electronic form, but Qualcomm does not currently expect to use them in that form to support its claims or defenses.

- A.iii. A computation of any category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

None known at this time.

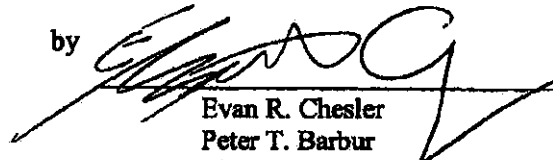
- A.iv. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

No such agreements exist.

December 21, 2007

CRAVATH, SWAINE & MOORE LLP,

by



Evan R. Chesler  
Peter T. Barbur  
Elizabeth L. Grayer  
Karin A. DeMasi

Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019-7475  
(212) 474-1000

MCCARTER & ENGLISH, LLP  
William J. O'Shaughnessy (WJO 5256)  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 622-4444

*Attorneys for Defendant*